

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

DURA AUTOMOTIVE SYSTEMS, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 19-12378-KBO

Jointly Administered

**Related D.I. 354, 494, 499, 510**

**THIRD SUPPLEMENTAL DECLARATION OF OSCAR N. PINKAS IN  
CONNECTION WITH THE ORDER AUTHORIZING EMPLOYMENT  
AND RETENTION AS COUNSEL TO THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS *NUNC PRO TUNC* TO NOVEMBER 1, 2019**

STATE OF NEW YORK                     )  
  )       SS:  
COUNTY OF NEW YORK               )

Pursuant to section 1746 of title 28 of the United States Code, I, Oscar N. Pinkas, hereby declare under penalty of perjury that the following is true to the best of my knowledge, information, and belief:

1. I am a partner of Dentons US LLP (“Dentons”), which maintains offices at, among other locations, 1221 Avenue of the Americas, New York, New York 10020.

2. This supplemental declaration (the “Third Supplemental Declaration”) is being submitted in connection with the *Application for Entry of an Order Authorizing the Employment and Retention of Counsel to the Official Committee of Unsecured Creditors* (the “Committee”) *nunc pro tunc* to November 1, 2019 [D.I. 354] (the “Application”). I make this declaration pursuant to sections 328 and 1103 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2014 of

<sup>1</sup> The debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity's federal tax identification number, are: Dura Automotive Systems Cable Operations, LLC (7052); Dura Automotive Systems, LLC (8111); Dura Fremont L.L.C. (1252); Dura G.P. (8092); Dura Mexico Holdings, LLC (4188); Dura Operating, LLC (2304); and NAMP, LLC (3693).

the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 2014-1 of the Local Rules for the United States Bankruptcy Court for the District of Delaware (the “Local Rules”).

3. Unless otherwise stated, I have personal knowledge of the facts set forth hereinafter.

4. On November 25, 2019, the Committee filed the Application. In support of the Application, the Committee filed the *Declaration of Oscar N. Pinkas in Support of Application for Entry of an Order Authorizing the Employment and Retention of Counsel to the Official Committee of Unsecured Creditors Nunc Pro Tunc to November 1, 2019* (the “Original Declaration”), which was attached to the Application as Exhibit A. On December 30, 2019, the Committee filed a supplemental declaration in support of the Application regarding compliance with “Large Case Fee Guidelines” [D.I. 494]. On December 31, 2019, the Committee filed a second supplemental declaration in support of the Application regarding adjusted rates for the year 2020 [D.I. 499].

5. On January 2, 2020, this Court entered an order authorizing the retention and employment of Dentons US LLP as counsel to the Debtors [D.I. 510].

6. On January 2, 2020, the Committee also filed the *Declaration of James R. Irving in Support of Application for Entry of an Order Authorizing the Employment and Retention of Counsel to the Official Committee of Unsecured Creditors Nunc Pro Tunc to November 1, 2019* [D.I. 505]. On January 7, 2020, the Court entered an *Order Authorizing the Employment and Retention of Bingham Greenebaum Doll LLP as Counsel to the Official Committee of Unsecured Creditors Nunc Pro Tunc to November 1, 2019* [D.I. 544].

7. In connection with the Application and all declarations in support thereof, I submit this Third Supplemental Declaration to provide additional disclosures in accordance with Bankruptcy Rule 2014(a) and as required under the retention orders. Except as otherwise indicated herein, all facts stated in this Third Supplemental Declaration are based on my personal knowledge

of Dentons' operations and finances, information learned from my review of relevant documents, and information supplied to me by Dentons' partners or employees. If called upon to testify, I could and would testify on that basis.

8. As described in the Original Declaration, in October of 2019, Dentons' partners voted to approve a combination with Bingham Greenbaum Doll LLP ("BGD") and Cohen & Grigsby, P.C. ("C&G"). This combination includes the formation of a new partnership, Dentons United States LLP, in which the partners and the shareholders of each firm shall be partners. This combination has now taken effect. Accordingly, the retention orders included and contemplated the retention of Dentons United States LLP.

9. This Third Supplemental Declaration, and accompanying schedules, makes certain additional disclosures. As I stated in the Original Declaration, Dentons has searched its electronic database (which includes BGD and C&G) of representations for connections to parties in interest in these chapter 11 cases. Certain connections were disclosed in the Original Declaration. Since that filing, Dentons has updated those conflicts searches and has searched additional parties as Dentons has become aware of additional parties in interest in these chapter 11 cases. In addition to the entities searched and disclosed in the Original Declaration, the search included the entities listed on Schedule 1 attached hereto. I have included the results of such conflicts searches on Schedule 2 attached hereto. Disclosures will be updated as necessary and when Dentons becomes aware of material information.

10. All prior and current representations of the entities listed on Schedules 1 and 2, attached hereto, have been in matters unrelated to the Debtors or these chapter 11 cases.

*[Signature page follows]*

Dated: February 14, 2020

/s/ Oscar N. Pinkas

Oscar N. Pinkas

Partner, Dentons US LLP

*Counsel to the Official Committee of  
Unsecured Creditors*

**SCHEDULE 1****Searched Parties**

Relationship to Debtor	Name
U.S. Trustee, Judges, and Court Contacts	Attix, Lauren Buchbinder, David Casey, Linda Chan, Ashley M. Dice, Holly Dorsey, John T. Dortch, Shakima L. Fox, Timothy J., Jr. Giordano, Diane Green, Christine Gross, Kevin Hackman, Benjamin Heck, Jeffrey Leamy, Jane McCollum, Hannah M. O'Malley, James R. Owens, Karen B. Panacio, Michael Richenderfer, Linda Sarkessian, Juliet Schepacarter, Richard Shannon, Brendan L. Serrano, Edith A. Silverstein, Laurie S. Sontchi, Christopher S. Starr, Karen Vinson, Ramona Walrath, Mary F. Wynn, Dion
<b>Debtor Professionals</b>	Bayard P.A.
[REDACTED]	[REDACTED]

Relationship to Debtor	Name
	<div>[REDACTED]</div>

**SCHEDULE 2****Match List**

<b>Party Name</b>	<b>Relationship to Debtor</b>	<b>Relationship to Debtors</b>
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]

As Dentons Group is a Swiss Verein, matters that concern a current “US Client” above are the only ones that could present a potential conflict unless one of the Legal Practices is in fact retained. The chart below lists all matches of the Legal Practices, which are outside the United States. As such, the references to “Non-US Client” below constitutes disclosure regarding matches on the conflicts databases of the Legal Practices, are provided for completeness, and in advance of any retention of such Legal Practice if in fact that does occur.

[illegible]